UNITED STATE DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Albert William Bleau Jr.

Plaintiff

Civil Action Vs.

No. 04 - 10469REK

Bridgewell, Inc. (Greater Lynn Mental Health & Retardation Association), et al,

Defendants

Motion Ordering Defendant Bridgewell, Inc. To Produce Documents Requested By The Plaintiff Pursuant To Federal Rule 37.1 And That Sanctions Be Ordered Against the Defendant

Albert W. Bleau Jr., the plaintiff, submitted a request for documents on March 9, 2006 pursuant to Federal Rule 34 and the defendants responded with a request for Interrogatories and their response on May 11, 2006 refusing to provide any documents except the request for the addresses for GLMHRA and Bridgewell board members.

The plaintiff called the defendant on several occasions and was refused access to Bridgewell's corporate offices and was assured that documents were forthcoming.

As a result, the plaintiff has not been able to go forward and prepare his interrogatories or proceed with discovery including written questions and depositions.

The plaintiff set aside six days from work to enter the premises of the defendants to copy documents that plaintiff had requested.

The plaintiff now requests that this honorable court order the defendants to produce the documents requested by the plaintiff and to order sanctions against the defendant Bridgewell, Inc.

Respectfully submitted,

Albert W. Bleau Jr. 505 Paradise Rd. #208 Swampscott, MA 01907

(781) 962-2662 (781) 367-4435- Temporary number

Dated: July 6, 2006 CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail and by hand on July 6, 2006.

Albert W. Bleau Jr.